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8 Attorneys for Plaintiff And The Proposed Class

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA, SOUTHERN DIVISION

11 KELLY RYAN, an individual, on  
behalf of herself and all others similarly  
12 situated,

13 Plaintiff,

14 vs.

15 LUMBER LIQUIDATORS, INC., a  
Delaware corporation,

16 Defendant.

17 Case No. 2:15-cv-00957-JAD-VCF

**STIPULATION TO EXTEND TIME  
TO RESPOND TO COMPLAINT  
[FRCP 6(B)(1)]**

18 Pursuant to F.R.C.P. 6(b)(1), Plaintiff Kelly Ryan and Defendant Lumber  
19 Liquidators, Inc., by and through their undersigned counsel, stipulate as follows:

20 WHEREAS, Plaintiff filed the Complaint in this action on May 26, 2015;

21 WHEREAS, Lumber Liquidator's initial response to the Complaint is due on  
June 16, 2015;

22 WHEREAS, there are currently 123 similar cases pending against Lumber  
23 Liquidators in 26 states, and a decision by the JPML is expected any day in MDL  
24 No. 2627 to consolidate and transfer all of these cases for pretrial proceedings  
25 pursuant to 28 U.S.C. §1407. See, *In Re: Lumber Liquidators Chinese-*

26 *Manufactured Flooring Products Marketing, Sales Practices and Products Liability*  
27 *Litigation;*

28 18503.1

2:15-cv-00957-JAD-VCF

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT  
[FRCP 6(B)(1)]

1        WHEREAS, the parties have agreed that the deadline for Lumber Liquidators  
2 to respond to the Complaint shall be extended by thirty (30) days up to and  
3 including July 13, 2015;

4        NOW THEREFORE, IT IS HEREBY AGREED AND STIPULATED that  
5 Defendant Lumber Liquidator's deadline to respond to Plaintiff's Complaint shall be  
6 extended by thirty (30) days from the earliest response date, to and including July  
7 13, 2015.

8 DATED: June 12, 2015

ROBERTSON & ASSOCIATES, LLP

9 By: 

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15 *Attorneys for Plaintiff And The Proposed  
Class*

16 DATED: June 12, 2015

SNELL & WILMER, LLP

17 By: 

18 William E. Peterson, Esq. (Bar No. 1528)  
C. Thomas Burton, Jr., Esq. (Bar No. 3030)  
19 Carrie L. Parker, Esq. (Bar No. 10952)  
Carrie L. Parker, Esq. (Bar No. 10952)  
20 50 West Liberty Street, Suite 510  
Reno, Nevada 89501

21 *Attorneys for Defendant LUMBER  
LIQUIDATORS, INC.*

22 IT IS SO ORDERED.

23 Dated: June 18, 2015



24 DISTRICT COURT JUDGE  
United States Magistrate

## CERTIFICATE OF SERVICE

2 The undersigned hereby certifies that on the 12<sup>th</sup> day of June, 2015, the  
3 foregoing document entitled **STIPULATION TO EXTEND TIME TO**  
4 **RESPOND TO COMPLAINT [FRCP 6(B)(1)]** was filed and served  
5 electronically via the Court's CM/ECF system to all CM/ECF participants listed on  
6 the e-service master list.

  
An R.  
An employee of the law firm of  
Robertson & Associates, LLP